

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LAWRENCE J. KONCELIK, JR.,)	
)	
Plaintiff,)	Civil Action No. 08-C-623
)	
v.)	Judge: Bucklo
)	Magistrate Judge: Nolan
SUNBEAM PRODUCTS, INC.)	
d/b/a JARDEN CONSUMER)	
SOLUTIONS)	
)	
Defendant.)	

DEFENDANT’S MOTION TO STAY PROCEEDINGS
PENDING REEXAMINATION OF PATENT-IN-SUIT

Defendant Sunbeam Products, Inc. d/b/a Jarden Consumer Solutions (“Sunbeam”), by and through its attorneys, moves this Court for an Order to stay these proceedings related to U.S. Patent No. 7,096,766 (the “‘776 Patent”) asserted by plaintiff Lawrence J. Koncelik, Jr. pending the resolution of reexamination of the ‘776 Patent by the United States Patent and Trademark Office. Sunbeam contemporaneously files herewith a memorandum in support of this motion and incorporates that memorandum as if fully set forth herein.

WHEREFORE, Defendant Sunbeam Products, Inc. d/b/a Jarden Consumer Solutions respectfully requests that this Court to stay these proceedings pending the resolution of reexamination of the ‘776 Patent by the United States Patent and Trademark Office, and to confer any further relief that the Court deems just and appropriate.

Dated: August 14, 2008

HUSCH BLACKWELL SANDERS LLP

/s/ Michael R. Annis
Michael R. Annis
Gary A. Pierson, II
720 Olive St., 24th Floor
St. Louis, Missouri 63101
Telephone: (314) 345-6000
Facsimile: (314) 345-6060

Attorneys for Defendant Sunbeam Products, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this the 14th of August, 2008, the foregoing was served by operation of the Court's electronic filing system and/or first-class U.S. mail, postage prepaid, upon the following:

Christopher E. Haigh
THE LAW OFFICE OF CHRISTOPHER HAIGH
2038 N. Clark, #105
Chicago, Illinois 60614

Geoffrey A Baker
Illinois Bar No. 6236658
DOWELL BAKER, P.C.
229 Randolph Street
Oak Park, IL 60302
Telephone: (708) 660-1413
Facsimile: (312) 873-4466

/s/ Michael R. Annis